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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF CONNECTICUT

SRS

0007640

UNITED STATES OF AMERICA,

Civil Action No. H-79-704

Plaintiff,

-vs-

AFFIDAVIT

SOLVENTS RECOVERY SERVICE OF NEW ENGLAND,

Defendant

I, Edward L. Taylor, first being duly sworn, depose and say as follows:

- 1. Since April 18, 1971, I have been employed by the United States Environmental Protection Agency as Chief of the Chemistry Section, Analysis Division at the EPA New England Regional Laboratory. My duties in this position include the management of chemical laboratory services performed at the New England Regional Laboratory, as well as the management of a contract between EPA, Region I and various private laboratories, under which these laboratories conduct chemical analyses for EPA.
- 2. In this capacity, I have performed work in support of the case of U.S. vs. Solvents Recovery Service of New England. This work has included the oversight of certain chemical laboratory services performed at the New England Regional Laboratory with respect to samples obtained on and in the vicinity of the Solvents Recovery Service of New England site. I have also arranged for the analysis of certain SRSNE samples by three different local laboratories under the contract referred to in paragraph 1, above.
- 3. The attached documents specify the work performed by the three local laboratories (GCA Corporation, GTE Laboratories, Inc., and Energy Resources Co., Inc.) on SRSNE samples and state the costs incurred by the government in procuring those services.
- 4. The expenses to the government for the work described in paragraph 3, above, was \$4,940.00.
- 5. The chemical laboratory services performed by the New England Regional Laboratory included with respect to SRSNE samples the following: analysis of 15 samples in March of 1980 for volatile organics, and analysis of 33 samples in September of 1982 for volatile organics.

- 6. Although the cost accounting procedures of the New England Regional Laboratory do not provide cost data on a sample by sample basis, governmental costs in providing these laboratory services can be estimated by analogy to private laboratory costs. Since samples analyzed by the New England Regional Laboratory are subject to more extensive quality control and verification procedures than are samples analyzed by private laboratories and since in all other respects (i.e., equipment, maintenance, space) EPA and private costs are equivalent, private laboratory costs are an accurate indication of minimal governmental costs.
- 7. Costs incurred over the past six months for volatile organic analyses by private laboratories indicate an average cost of \$313 per sample. This average cost reflects a decline from the average commercial laboratory costs in past years due to increased automation and increased familiarity with EPA analytical protocols.
- 8. Based on an average cost of \$313 per sample, it can be estimated that the cost to the government for conducting the analyses referred to in paragraph 5, above, has been at least \$15,024.
- 9. The total cost incurred by the government for the analytical work described in paragraphs 3 and 5, above, has been \$19,964.

Further, Affiant sayeth not.

Edward L. Taylor Chief, Chemistry Section

SUBSCRIBED AND SWORN TO BEFORE ME THIS 21st DAY OF OCTOBER, 1982

Notary Public

My Commission expires on

6/19/89

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

60 WESTVIEW STREET, LEXINGTON, MASSACHUSETTS 02173

RECEIPT OF SAMPLES FOR ANALYSIS

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	Signed: Dane Fessonle
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12 June 1981

GCA CORPORATION Technology Division

213 Burlington Road Bedford, Massachusetts 01730 Telephone: 617-275-5444 Telex: 92-3339

Environmental Protection Agency Region I - NERL 60 Westview Street Lexington, MA 02173

Attention: Ms. Elaine Thiesing

Subject: Blanket Purchase Order No. 1Z0096NCLX

(GCA 4-200-875-06)

Gentlemen:

GCA is pleased to confirm its verbal estimate provided on 12 June 1981 by M. Atkinson to E. Thiesing of \$2,620 on a firm fixed price basis for analysis of twelve (12) fluid samples for volatile organics; four (4) fluid samples for methyl ethyl ketones, methyl isobutyl ketones, isopropyl alcohol, tetrahydrofuran, and acetone; and four (4) fluid samples for acid extractables and base/neutral extractables. GCA is prepared to submit a written report of results within thirty (30) days of receipt of samples.

Should any additional information be required, please feel free to contact the undersigned.

Very truly yours,

Arthur Engelman

Manager, Contract Administration

AE: jaf

ERCO Energy Resources Co. Inc.

0007647

185 Alewife Brook Parkway Cambridge, Massachusetts 02138 (617) 661-3111 TWX 710-320-0721 Washington, D.C. Houston, Texas Torrance, California La Jolla, California Walnut Creek, California Paris, France Zurich, Switzerland

June 12, 1981

Elaine Thiesing EPA 60 Westview Street Lexington, MA 02173

Dear Elaine,

ERCO is pleased to submit the following quote for the analysis required by the EPA Lexington laboratory.

TYPE OF ANALYSIS	PRICE/SAMPLE	TOTAL
12 VOA's	\$160	\$1920
4 Base/Neutral Fractions	300	1200
4 Acid Fractions	200	800
	TOTAL	\$3920

If you require additional information call me at 661-3111.

Sincerely yours,

Celu R. Yasser

Director of Laboratory Services

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B. I certify t	hat the articles or service nd quality specified, or the	s indicated in the	'Quantity Received'' c	olumn were recei	ved on the o	iate shown	below and in
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approved.

Date: 9/13/8-

Ellagh Project Director

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

60 WESTVIEW STREET, LEXINGTON, MASSACHUSETTS 02173

RECEIPT OF SAMPLES FOR ANALYSIS .

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on	6-23	19882	
samples.	Sample No.'s	53338	
ı	-	53339	
per Call	No. #2, PO 2	Z0065NALX	
		Signed: Novalet L. W.	eggle
		Title: MtS	_
		Company: GTE Date: 6/73/8	- -

2 Well Water Samples for Volatile Organics

0007654

June 17, 1982

GTE

Ms. Elaine Thiesint Environmental Protection Agency 60 Westview Street Lexington, MA 02173

Dear Ms. Thiesint:

Ref.: P. O. #2Z0065NALX

Confirmation is given to the following bids made on June 16, 1982 under P. O. #2Z0065NALX.

Job #1 - 2 well water samples - volatiles - \$200.00

Job #3 - 2 well water samples - extractables - \$600.00

Job #5 - 14 well water samples - volatiles - \$1,000.00

Job #6-2 water samples PCBs - \$200.00

Sincerely,

Paul Lublin

Manager

Materials Evaluation

/jal

cc: D. Bracco

D. Dugger

R. Keegan

R. Black

F. J. Reid

P. E. Ritt

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EPA Form 1900-13 (10-71)

GPO: 1971 O - 449-5

This form is designed for an elit	e typewi	riter <i>(12</i>	-pitch).					<u>,</u>				5 FA	re Be	QUIRE	ъ					
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I. Method of Analysis

- Method 624, Federal Register, 12/3/79

II. Holding Time and Preservation

- Samples must be run within 7 calendar days after contractor receives samples.
- Samples must be refrigerated at 4°C.

III.	Detection Limits	dqq
	Priority Pollutants	1-2
	acetone	100
	isopropyl alcohol	100
	Methyl ethyl ketone	100
	Methyl isobutyl ketone	10
	tetrahydrofuran	100
	dioxane	100
	ethylene glycol	-

IV. Due Date

- Data must be reported within 30 calendar days after contractor receives samples.

0007658

11/10/8	ER 1	2. CONTRACT NO	CK.		ORDER 22	0065MA	LI	· · · · · · · · · · · · · · · · · · ·	و	PAGE
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^{18.} I certify th	at the articles or ser	vices indicated in the	e "Quantity Received"	column were receiv	ed on the o	ate shown be	PAGES low and is				
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(Company	•
Samples were received on	7/28/82 Payment is
approved.	
Date: 9/13/82	Edward Tayla Project Director
Note There was a gotente	il QC pblom & decision
to use data was not no	rade till 9/52

Authorization is hereby given for Call No. _____ of



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

60 WESTVIEW STREET, LEXINGTON, MASSACHUSETTS 02173

RECEIPT OF SAMPLES FOR ANALYSIS '

Received from Reck	and Ceeshman of EPA, NERL
on June 23	1980 2
	53339 (Ibotlles each) 53340 (""")
-	53340 (" ")
per Call No. #3, PO	2Z0065NALX
•	Signed: Word I. Wugger Title: 1475
	Company: GTE Date: 6/23/82

2 Well Water Samples for Extractable Organics

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EXTRACTABLE ORGANICS

I. Methods of Analysis

Methoxychlor:

"Method for Organochlorine Pesticides in Industrial Effluents", U.S. EPA, EMSL,

Cincinnati, OH, 11/28/73

2,4-D and 2,4,5-TP

"Method for Chlorinated Phenoxy Acid Herbicides

in Industrial Effluents", U.S.EPA, EMSL,

Cincinnati, OH, 11/28/73

Others*

Method 625, Federal Register, 12/3/79

*If any dioxins are found using Method 625, then method 613** must be performed to confirm the presence of 2,3,7,8-tetrachlorodibenzo-p-Dioxin. Quantitation is to be done using method 613**.

**Method 613, Federal Register, 12/3/79.

II. Holding Times and Preservation

Samples must be extracted within 7 calendar days of receipt and analyzed within 30 days of receipt.

Samples are to be refrigerated at 4°C.

III. Detection Limits

Methoxychlor, 2,4-D and 2,4,5-TP - 1 ppb

IV. Due Date

- Data must be reported within 30 calendar days after contractor receives samples.

MARK ALL PACKAGES AND PAPERS WITH CONTRACT AND/OR ORDER NUMBERS

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Authorization is hereby given for Call No. _______ of _______.

Company

Samples were received on _________. Payment is approved.

Date: 9/13/82

Solward Tayh
Project Director

Where was a potential QC problem with the analysis of diasin to use data was not malable 9/82



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

60 WESTVIEW STREET, LEXINGTON, MASSACHUSETTS 02173

RECEIPT OF SAMPLES FOR ANALYSIS '

Received from Richard Cushman of EPA, NERL
on frue 23 1988- 13
samples. Sample No.'s 53331,53332,53333,53334, 53335,53336,53337,5334/, 53342,53343,53344,53345,5334
Signed: No. #4, PO 2Z0065NALX Signed: No. MTS Company: GTE Date: 6/23/82

14 Well Water Samples for Volatile Organics



GCA CORPORATION Technology Division

213 Burlington Road Bedford, Massachusetts 01730 Telephone: 617-275-5444 Telex: 92-3339

Environmental Protection Agency Region I - IERL 60 Westview Street Lexington, MA 02173

Attention: Ms. Elaine Thiesing

Subject:

Blanket Purchase Agreement No. 2Z0096NALX

(GCA 4-201-100-09)

Gentlemen:

GCA is pleased to confirm its verbal estimate provided this date by M. Atkinson to E. Thiesing on a firm fixed price basis in the amount of \$1,624 for analysis of fourteen (14) well water samples for low and medium level volatile organics, 30 EPA priority pollutants plus acetone, isopropyl alcohol, MEK, MIBK, and THF. The unit sample analysis cost of \$116 per sample assumes receipt of all fourteen (14) samples in a single lot.

The analysis protocol to be utilized is the "Method 624" as published in the Federal Register 12/3/79.

Sample analysis will be performed within seven (7) calendar days and GCA will provide a written report of results within thirty (30) calendar days of receipt of samples.

Should any additional information be required in conjunction with this matter, please feel free to contact the undersigned.

Very truly yours,

Manager, Contract Administration

AE:jaf

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Volatile Organics - Medium levels

I. Method of Analysis

- Method 624, Federal Register, 12/3/79

NOTE: Some volatile constituents may be present up to 20 ppm.

II. Holding time and Preservation

- Samples must be run within 7 calendar days after contractor receives samples.
- Samples must be refrigerated at 4°C.

III.	Detection Limits	ppb
	Priority pollutants	2
	acetone isopropyl alcohol	100 _. 100
	Methyl ethyl ketone	100
	Methyl isobutyl ketone	25
•	tetrahydrofuran	100

IV. Due Date

- Data must be report within 30 days after contractor receives samples.

MARK ALL PACKAGES AND PAPERS WITH CONTRACT AND OR ORDER NUMBERS

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Authoriz	zation is hereby given y	for Call No.	of
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approved.			
Dugt	liete - Or	ig. sent 7/	51/02
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

60 WESTVIEW STREET, LEXINGTON, MASSACHUSETTS 02173

RECEIPT OF SAMPLES FOR ANALYSIS

Received from Richard	Ceshman of EPA, NERL
on June 23	19862 2
	3339,53340
	
per Call No. #3, PO #2Z006	3NALX
•	Signed: Dull Wit
	Title: Savin Organic Chamit
	Company: ERCO
	Date: 6/23/82
2 Well Water Sample for Meta	als .



16 June 1982

GCA CORPORATION Technology Division

213 Burlington Road Bedford, Massachusetts 01730 Telephone: 617-275-5444 Telex: 92-3339

Environmental Protection Agency Region I-IERL 60 Westview Street Lexington, MA 02173

Attention: Ms. Elaine Thiesing

Subject:

Blanket Purchase Agreement No. 220096NALX

(GCA 4-201-100-06)

Gentlemen:

GCA is pleased to confirm its verbal estimate provided this date by M. Atkinson to E. Thiesing on a firm fixed price basis in the amount of \$650 for analysis of two (2) well water samples for the following metals: Ba, Sb, As, Be, Cd, Cr, Cu, Pb, Hg, Ni, Se, Ag, Tl, and Zn. The unit sample analysis cost of \$325 per sample assumes receipt of both samples in a single lot.

The analysis protocol to be utilized is the "Method for Chemical Analysis of Water and Waste," (3/79), EPA-600-4-79-020.

GCA will provide a written report of results within thirty (30) calendar days of receipt of samples.

Should any additional information be required in conjunction with this matter, please feel free to contact the undersigned.

\L\X\\Z\

Arthur Engelman
Manager, Contract Administration

AE: jaf

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Edward Taylor	
C. PHONE NO. d. MAIL CODE 6. DIVISION b. PHONE NO. 6. PROCU	REMENT OFF
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8. FINANCIAL DATA (a) APPROPRIATION NOTE: ITEM 8(c) DOCUMENT TYPE - Contract = "C" Purchase Order = "P" IGA = "A" Other (misc.) = "	("
D DOCUMENT OBJECT AMOUNT (g)	
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AS: ORIGINAL DECREASE	
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STOCK OR ITEM NO. DESCRIPTION QUANTITY ISSUE COST	AMOUNT
(12) (13) (14) (15) (16)	(17)
Well-Water Samples for the following	
Analyses:	
No. of Samples Analyses	
2 Metals:	
Barium, antimony, arsenic, beryllium, cadmium, chromium,	
beryllium, cadmium, chromium, copper, lead, mercury, nickel,	•
selenium, silver, thallium, zinc	
	·
Analyses must be performed according to	
the methods and conditions on the attached	
sheet.	
Samples will arive during week of June 21.	
Acct. No. 2TFA01LH08	
18. SUGGESTED CONTRACTOR/VENDOR 20. SIGNATURE OF ORIGINATOR	DATE
	_6/8/92
21. SIGNATURE OF PROP. MGMT. OFFICER/DESIGNEE	6/8/82 DATE
	I F PRAM
19. RECOMMENDED PROCUREMENT METHOD 22. ACCOUNTABLE PROPERTY 23. NOT AVAILA EXCESS	LE PROM
COMPETITIVE NONCOMPETITIVE (Justification attached) INITIALS	
24. APPROVALS	DATE
B. BRANCH/OFFICE DATE d. FINANCE	·
BRANCH/OFFICE DATE DATE d. FINANCE	DATE
S. BRANCH/OFFICE DATE DATE DATE O007679	
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METALS

I. Methods of Analysis and Detection Limits

("Methods for Chemical Analysis of Water and Wastes" (3/79) EPA-600-4/79-020)

Metal	Mtd.	Detection Limit, ppb
Ва	208.1*	100
Sb	204.2	5
As	206.2, 206.3	3
Be ^	210.1*	10
Cd	213.1*	10
Cr	218.1*	50
Cu	220.1	, 50
Pb	239.1*	100
Hg	245.1, 245.2	0.2
Ni	249.1*	100
Se	270.2, 270.3	5
Ag	272.1**	10
Tl	279.2**	5
Zn	289.1*	10

^{*}Precede this method with digestion described in section Metals 4.1.3 or 4.1.4.

II. Due Date

- Data must be reported within 30 days after contractor receives samples.

^{**}Precede this method with digestion described in section Metals 4.1.3 or 4.1.4 except that no Hcl is used.

11/10/		2. CONTRACT NO	(If eny)	3. ORD	ER NO. 2200	63EAI	X SANS		PAGE 1 O
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RECEIVIN	G REPORT	1. WEIGHT	•	2. PURCHASE ORDER NO. 2Z0063NALX, Call #4					
REQUISITIONING OFFICE NERL, 60 Westview		· · · · · · · · · · · · · · · · · · ·	5. CONTRA	CONTRACT NO.					
	ive name and mailing address. Incl	lude ZIP code)	· · · · · · · · · · · · · · · · · · ·	7. REQUISI	TION NO.				
Energy Resource 185 Alewife Bro Cambridge, MA (es Inc. ook Parkway		8. TYPE O	F RECEIPT					
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15. REMARKS (Include date con-	cerning supplies or services not co	nforming to contractual re-	quirements)	16.* TOTA ALL I	L COST OF				
				17. PAGE	1 OF	PAGES			
18. I certify that the articles quantity and quality speci	or services indicated in the "Ç ified, or the services have been	Quantity Received" colu performed as stated, e	ımn were recei: xcept as noted	ved on the d under "Ren	late shown b	elow and in the			
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21. DATE RECEIVED	22. SIGNATURE OF AUTI	HORIZED EMPLOYEE, RE	EQUISITIONING	OFFICE					
9-9-82	ABLE OFFICER OR DESIGNED	24. DATE	- F.	25. VOUC	HER NO.				

Authorization is nereby	given for our same
ERCO	_•
(Company	
Samples were received o	n 7/23/82 Payment is (Date)
approved.	
·	
Date:	Elward Toyh
•	Project Director



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION I

60 WESTVIEW STREET, LEXINGTON, MASSACHUSETTS 02173

RECEIPT OF SAMPLES FOR ANALYSIS

Received	from Reshau	I Cashma	of EPA, NERL	
on	me 23	1982	2	
			+ 53340 ×	
	-			
per Call	No. #4, PO 22	COO63NALX	- <u> </u>	 .
	•	Signed:_	Dellas Wait	
		Title:	Senior Organic (1	mmy
		Company:		
		Date:	6/53/82	

2 Well Water Samples for Nitrate
2 Well Water Samples for Fluoride

* Separato Ittle for each analysis.



0007685

One Alewife Place Cambridge, Massachusetts 02138 (617) 661-3111 TWX 710-320-0721 Denver, Colorado Houston, Texas La Jolla, California Midland, Texas Oklahoma City, Oklahoma Paris, France Walnut Creek, California Washington, D.C. Zurich, Switzerland

June 24, 1982

Ms. Elaine Theisling EPA Region I 60 Westview Street Lexington, MA 02173

Dear Ms. Theisling:

This is to confirm two verbal bids given to you by telephone on 6 well water sample analyses.

Bid #1 - 2 well waters for:
Ba, Sb, As, Be, Cd, Cr, Cd, Pb, Hg,
Ni, Se, Ag, Tl, Zn (by EPA methods)

**Total: \$420.00

Bid #2 - 4 well waters for:
2-Nitrate (EPA methods)
2-Fluoride (EPA methods)

Total: \$100.00

The results would be delivered to you within days of sample receipt. If there are any questions, please do not hesitate to call.

Sincerely,

Nile A. Luedtke

NAL: pam



16 June 1982

GCA CORPORATION Technology Division

213 Burlington Road Bedford, Massachusetts 01730 Telephone: 617-275-5444 Telex: 92-3339

Environmental Protection Agency Region I - IERL 60 Westview Street Lexington, MA 02173

Attention: Ms. Elaine Thiesing

Subject: Blanket Purchase Agreement No. 2Z0096NALX

(GCA 4-201-100-008)

Gentlemen:

GCA is pleased to confirm its verbal estimate provided this date by M. Atkinson to E. Thiesing on a firm fixed price basis in the amount of \$166 for analysis of two (2) well water samples for nitrate only and two (2) well water samples for fluoride (preceded by distillation).

The analysis protocol to be utilized is the "Method for Chemical Analysis of Water and Waste," (3779), EPA 600-4-79-020.

Sample analysis will be performed within seven (7) calendar days and GCA will provide a written report of results within thirty (30) calendar days of receipt of samples.

Should any additional information be required in conjunction with this matter, please feel free to contact the undersigned.

(11/2/2/2/

Arthur Engelman

Manager, Contract/Administration

AE: jaf

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NITRATE AND FLUORIDE

I. Methods of Analysis

(Refer to Methods for Chemical Analysis of Water and Wastes, March, 1979, EPA-600-4/79-020)

- A. Fluoride Method 340.2 preceded by the distillation in method 340.1.
- B. Nitrate Method 352.1, 353.1*, 353.2* or 353.3*

*Nitrite must be subtracted from the "Nitrate plus nitrite" values.

II. Holding Times and Preservation

- Analyses (for both) must be run within 7 calendar days after the contractor receives the samples.
- Samples must be refrigerated at 4°C.

III. Detection Limit

- For both: 0.1 ppm

IV. Due Date

- Data must be reported within 30 calendar days after contractor receives samples.